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Mario Tafur, Esq. (SBN: 329899) 1 **BULLDOG LAW, P.C.** 500 N. Central Avenue, Suite 610 2 Glendale, California 91203 3 (855) 216-3990 mario@thebulldog.law 4 5 Attorney for Defendant, CARLOS JESUS JORDAN LOPEZ 6 7 8 9 10 11 UNITED STATES OF AMERICA, 12 Plaintiff, 13 VS. 14 CARLOS JESUS JORDAN LOPEZ, 15 Defendant. 16 17 18

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALFIORNIA

Case No.: 24-CR-00123-JTL-SKO-1

STIPULATION REGARDING EXCLUDABLE TIME PERIODS UNDER RULE 32; [PROPOSED] FINDINGS AND ORDER

DATE: January 13, 2025 **TIME:** 9:00 AM

COURT: Hon. Jennifer L. Thurston

Plaintiff, UNITED STATES OF AMERICA, by and through its counsel of record, United States Attorney for the Eastern District of California and Assistant U.S. Attorneys Dennis Lynn Lewis, and defendant CARLOS JESUS JORDAN LOPEZ, ("defendant"), by and through his counsel of record, Mario Tafur, Esq., hereby agree and stipulate as follows:

The Sentencing Hearing is currently scheduled for January 13,2025, at 9:00 a.m., before Judge Jennifer L. Thurston. The parties are stipulating to have the sentencing be continued to March 17, 2025, at 9:00 a.m.

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Defendant Carlos Jesus Jordan Lopez's counsel Mario Tafur desires a continuance because he needs additional time to time to prepare the sentencing memorandum. Counsel will also like an opportunity to have probation look at the notes from their interview to prepare defendant's probation report.

Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

The government does not object to the continuance.

By this stipulation, defendant now moves to continue the sentencing hearing from January 13, 2025, to March 17, 2025, at 9:00 a.m., or to such other time thereafter as is convenient to the Court.

The time period of January 13, 2025, to March 17, 2025, inclusive, is deemed excludable pursuant to Rule 32, Rules of Criminal Procedure, because it results from a continuance granted by the Court at defendant's request. The parties stipulate that the additional time is necessary for defense to be prepared for the sentencing hearing and that such need is good cause for the short continuance.

IT IS SO STIPULATED:

Dated: December 24, 2024	PHILLIP A. TALBERT United States Attorney
	/s/ Dennis Lewis Dennis Lewis Assistant United States Attorney
Dated: December 24, 2024	/s/ MARIO TAFUR Attorney for Defendant Lopez

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[PROPOSED] FINDINGS AND ORDER

Good cause appearing based upon the stipulation of the parties and request by the defendant for additional time to prepare for sentencing, the sentencing hearing in the above-entitled case is hereby continued from January 13, 2025, to March 17, 2025, at 9:00 am. All other orders remain in full force and effect.

IT IS SO FOUND AND ORDERED this $\underline{26th}$ day of December 2024.

JNITED STATES DISTRICT JUDGE